MESA COUNTY - TRI RIVER AREA EXTENSION
DIVISION OF PEST MANAGEMENT
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Brian Amme, Vegetation EIS Project Manager
Bureau of Land Management
P.O. Box 12000
Reno, NV 89520-0006

Dear Mr. Amme:

1 I would like to submit comments on the *Draft BLM Vegetation Treatments Using Herbicides Programmatic EIS*. As the noxious weed manager for Mesa County, Colorado, I have direct experience with the impact of noxious weeds on both public and private property. Mesa County consists of 76% public lands, most of which is BLM. We are very fortunate to have Mark "Sparky" Taber with the BLM Grand Junction Office as the weed manager for this area. Without his dedication invasive weed problems in Mesa County would be much more severe.

Limiting the use of herbicides, banning aerial applications, or using only mechanical methods as proposed in the other alternatives, is not acceptable and will lead to difficulty controlling weed infestations, the spread of invasive species onto private lands and in wilderness areas, increased environmental impacts from dust and soil disturbance, and limited control of new populations of invasive weeds that could otherwise be eradicated.

As for concerns of the health aspects of herbicide use, for the most part problems occur when applicators are not properly trained. Health problems can be prevented when herbicides *are used as directed on the label*. BLM should use the best educational materials and conduct workshops to assure that employees who are applying herbicides are well trained. Applicators should be certified by their State to assure they are qualified to do their job. Each BLM field office should have a supervisor who is certified and who is assigned primarily as a weed manager. Weed management should be their primary job, not a secondary task that gets less than the full attention of the supervisor. Problems occur when there is insufficient training, supervision and leadership. These suggestions will make the BLM weed management efforts much more successful and, more importantly, safer for employees and the public.

Alternative A reflects the status quo. MORE not LESS weed control is needed on public lands. Public lands can be the source of infestations for private lands as livestock and people spread weed seeds. With the number of acres infested increasing by thousands of acres every year, BLM must keep expanding the number of acres treated if they intend to, at the very least, keep the weeds at bay.

I support Preferred Alternative B, expanding the herbicide list and acreage to be treated. Weed managers at all levels need to be able to select from the best tools in their weed management toolbox to tackle weed infestations. Limiting these choices hinders successful control of invasive weeds and may lead to herbicide

resistance if only a select few herbicides are allowed (as in Alternatives A and E). Expanding the number of acres slated for control will lead to improved rangeland productivity. Alternative B also allows BLM to evaluate and use new products as they become available. As new chemistry is marketed for weed control, it is imperative that BLM be able to use that technology as soon as possible, particularly when a new product targets a species that is difficult to control.

Alternative C, which does not allow the use of herbicides, could lead to worse air and water quality problems than the Preferred Alternative. More frequent trips will need to be made to weed infestations if mechanical control is the only allowed method for treatment. There will be increased foot traffic leading to deterioration of soil crusts and more dust problems. Mechanical control could lead to increased soil erosion and runoff into water sources. This alternative is not acceptable.

Alternative D bans aerial application of herbicides. Removing this tool from the weed management toolbox will lead to remote and rugged areas of BLM lands becoming heavily infested with noxious weeds. Aerial application reduces the impact of foot and equipment traffic, protecting soil crusts from deterioration. Proper use of drift control agents mixed with the herbicides, as well as manipulation of spray pressure, droplet size and other mechanical factors can reduce drift to a minimum. The application of Arsenal herbicide to 110 miles of the Pecos River in Texas in recent years was performed with a helicopter designed to limit spray drift to 3"-6" on either side of the boom. This was possible because of research done at Texas A&M. The information is available to any aerial applicator.

Alternatives A and E do not allow the use of imazapic based herbicides. This active ingredient is about the only herbicide that effectively controls Dalmatian toadflax, and is one of the better chemicals used for leafy spurge control. This herbicide should be allowed to be used on BLM.

Thank you for considering my comments. Please do not hesitate to call if you need more information.

Sincerely,

Judith M. Sirota

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